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11 Attorneys for Defendants **COUNTY OF LOS ANGELES, et. al.**

12 **UNITED STATES DISTRICT COURT**

13 **CENTRAL DISTRICT OF CALIFORNIA**

14 **DANIEL COHEN,**

15 **Plaintiff,**

16 **vs.**

17 **LOS ANGELES COUNTY, et. al.,**

18 **Defendants.**

) **Case No. 2:15-CV-03576 JAK**

) **(AGRx)**

) **[Complaint Filed: 5/13/15]**

)

) **DEFENDANT COUNTY OF LOS**

) **ANGELES' OBJECTIONS TO**

) **PLAINTIFF DANIEL COHEN'S**

) **RULE 30(b)(6) DEPOSITION**

) **NOTICE**

)

)

)

21 **TO PLAINTIFF DANIEL COHEN AND THEIR ATTORNEYS OF RECORDS**

22 **HEREIN:**

23 **PLEASE TAKE NOTICE** that Defendant COUNTY OF LOS ANGELES

24 hereby objects to the Rule 30(b)(6) notice of deposition served by Plaintiff

25 DANIEL COHEN which scheduled the deposition for October 14, 2021, at 10:00

26 a.m., on the grounds that said deposition was scheduled unilaterally by counsel for

1 Plaintiff without meeting and conferring with counsel for Defendant to determine
2 whether Defendant's designee(s) and/or counsel for Defendant were available for
3 the deposition. Defendant will meet and confer with Plaintiff's counsel to select a
4 mutually agreeable date for the deposition.
5

6 Further, Defendant objects to the Rule 30(b)(6) topics as follows:
7

8 **REQUEST NO. 1:**

9 Any and all facts regarding the medical treatment that Daniel Cohen
10 received from the County of Los Angeles between December 31, 2013 and May 8,
11 2014.

12 **OBJECTIONS TO TOPIC NO. 1:**

13 Objection. Defendant objects to this topic on the grounds it is vague, ambiguous,
14 and overbroad as to "medical treatment that Daniel Cohen received from the
15 County of Los Angeles." Defendant also objects to this topic on the grounds that it
16 is unduly burdensome and oppressive.

17 **REQUEST NO. 2:**

18 Any and all facts regarding any medical treatment, aid or attention received
19 by Daniel Cohen from Teresa Malone January 1, 2014 and May 8, 2014.

20 **OBJECTIONS TO TOPIC NO. 2:**

21 Objection. Defendant has already produced Teresa Malone for her deposition on
22 October 4, 2021, and she is the person most knowledgeable regarding her
23 treatment of plaintiff, therefore, Defendant objects to this topic on the grounds that
24 it is unduly burdensome and oppressive.

25 **REQUEST NO. 3:**

26 Any and all facts regarding any rep01i(s) of any incident(s) made by Daniel
27 Cohen in which he alleged that he was the victim of violence by any other inmate
28 01 pretrial detainee while in custody of the County of Los Angeles between
January 28, 2013 and May 8, 2014.

1 **OBJECTIONS TO TOPIC NO. 3:**

2 Objection. Defendant objects to this topic on the grounds it is vague, ambiguous,
3 and overbroad as to “any report(s) of any incident(s).” Defendant also objects to
4 this topic on the grounds that it is burdensome and oppressive.

5 **REQUEST NO. 4:**

6 Any and all investigations of the County of Los Angeles regarding any
7 allegation of Daniel Cohen that he was a victim of violence while he was in the
8 custod of the County of Los Angeles.

9 **OBJECTIONS TO TOPIC NO. 4:**

10 Objection. Defendant objects to this topic on the grounds it is vague, ambiguous,
11 and overbroad as to time, scope, and substance. Defendant also objects to this topic
12 on the grounds that it assumes facts, and is also irrelevant and unduly burdensome.

13 **REQUEST NO. 5:**

14 Any and all investigations of the County of Los Angeles regarding any
15 allegation of Daniel Cohen that he received inadequate medical treatment, aid or
16 attention while he was in the custody of the County of Los Angeles.

17 **OBJECTIONS TO TOPIC NO. 5:**

18 Objection. Defendant objects to this topic on the grounds it is vague, ambiguous,
19 and overbroad as to time, scope, and substance. Defendant also objects to this topic
20 on the grounds that it assumes facts, and is also irrelevant and unduly burdensome.

21 **REQUEST NO. 6:**

22 Any and all facts regarding any denial by the County of Los Angeles of any
23 request of Daniel Cohen for eyeglasses between January 28, 2013 and May 8,
24 2014.

25 **OBJECTIONS TO TOPIC NO. 6:**

26 Objection. Defendant objects to this topic on the grounds it is vague, ambiguous,
27 and overbroad as to “any denial by the County of Los Angeles of any request of
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1 Daniel Cohen for eyeglasses.” Defendant also objects to this topic on the grounds
2 that it assumes facts, and is also unduly burdensome and oppressive.

3 **REQUEST NO. 7:**

4 The identity of any County of Los Angeles employee who denied Daniel
5 Cohen's request for eyeglasses for the time period between January 28, 2013 and
6 May 8 2014.

7 **OBJECTIONS TO TOPIC NO. 7:**

8 Objection. Defendant objects to this topic on the grounds it is vague, ambiguous,
9 and overbroad as to scope and substance. Defendant also objects to this topic on
10 the grounds that it assumes facts, is unduly burdensome, and violates the privacy
11 rights of County of Los Angeles employees regarding their employment/personnel
12 records.

13 **REQUEST NO. 8:**

14 Any and all operative policies of the County of Los Angeles regarding the
15 housing, care and monitoring of vision-impaired inmates or pretrial detainees for
16 the time period between January 28, 2013 and May 8, 2014.

17 **OBJECTIONS TO TOPIC NO. 8:**

18 Objection. Defendant objects to this request on the ground it is vague, ambiguous,
19 and overbroad as to “any and all operative policies.” Defendant also objects to this
20 request on the grounds that it is conjunctive, burdensome and oppressive.

21 **REQUEST NO. 9:**

22 Any and all operative policies of the County of Los Angeles regarding the
23 protection of the inmates or pretrial detainees against violence by other inmates o
24 pretrial detainees for the time period between January 28, 2013 and May 8, 2014.

25 **OBJECTIONS TO TOPIC NO. 9:**

26 Objection. Defendant objects to this topic on the grounds it is vague, ambiguous,
27 and overbroad as to “any and all operative policies.” Defendant also objects to this
28 topic on the grounds that it is unduly burdensome and oppressive.

1 **REQUEST NO. 10:**

2 Daniel Cohen's housing assignments while in the custody of the County of
3 Los Angeles between January 28, 2013 and May 8, 2014.

4 **OBJECTIONS TO TOPIC NO. 10:**

5 Objection. Defendant objects to this topic on the grounds it is vague, ambiguous,
6 and overbroad. Defendant also objects to this topic on the grounds that it is unduly
7 burdensome and oppressive.

8 **REQUEST NO. 11:**

9 The identity of all doctors and nurses who provided medical care to Daniel
10 Cohen, on behalf of the County of Los Angeles, for the time period between
11 January 28, 2013 and May 8, 2014.

12 **OBJECTIONS TO TOPIC NO. 11:**

13 Objection. Defendant objects to this topic on the grounds it is vague, ambiguous,
14 and overbroad as to “all doctors and nurses who provided medical care to Daniel
15 Cohen, on behalf of the County Los Angeles.” Defendant also objects to this topic
16 on the grounds that it violates the privacy rights of the County of Los Angeles’
17 employees regarding their employment/personnel records, and is also burdensome
18 and oppressive as this information should be sought by other discovery methods.

19 **REQUEST NO. 12:**

20 Any and all facts regarding Deputy Shah's decision to cancel Daniel Cohen's
21 medical appointment in April of 2014.

22 **OBJECTIONS TO TOPIC NO. 12:**

23 Objection. Defendant Deputy Shah’s deposition was taken on October 7, 2021, and
24 he is the person most knowledgeable for the topic described. Therefore, Defendant
25 objects to this topic on the grounds that it is unduly burdensome and oppressive.

26 **REQUEST NO. 13:**

27 Any and all operative policies of the County of Los Angeles regarding the
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1 transport of inmates or pretrial detainees from the County of Los Angeles jail
2 facility to any outside medical facility for medical treatment purposes, for the time
3 period between January 28, 2013 and May 8, 2014.

4 **OBJECTIONS TO TOPIC NO. 13:**

5 Objection. Defendant objects to this topic on the grounds it is vague, ambiguous,
6 and overbroad as to “any and all operative policies.” Defendant also objects to this
7 topic on the grounds that it is irrelevant, unduly burdensome, oppressive, and seeks
8 information which could compromise the security of the transportation of inmates.

9 **REQUEST NO. 14:**

10 Any and all information that the County of Los Angeles had in its
11 possession regarding any eye surgery that Daniel Cohen had for the time period
12 between January 28 2013 and May 8, 2014.

13 **OBJECTIONS TO TOPIC NO. 14:**

14 Objection. Defendant objects to this topic on the grounds it is vague, ambiguous,
15 and overbroad as to “any and all information that the County of Los Angeles had in
16 its possession.” Defendant also objects to this topic on the grounds that it is unduly
17 burdensome and oppressive.

18 **REQUEST NO. 15:**

19 The identity of the Los Angeles County Deputies who were on duty in the
20 donitory where Daniel Cohen was housed during the time period between
21 February 12, 2013 and February 15, 2013.

22 **OBJECTIONS TO TOPIC NO. 15:**

23 Objection. Defendant objects to this topic seeks information that violates the
24 privacy rights of County of Los Angeles’ employees regarding their
25 employment/personnel records. Defendant also objects to this topic on the grounds
26 that it is unduly burdensome and oppressive as this information should be sought
27 by other discovery methods.

1 **REQUEST NO. 16:**

2 Any and all information regarding Daniel Cohen being selected for work
3 release in March 2013.

4 **OBJECTIONS TO TOPIC NO. 16:**

5 Objection. Defendant objects to this topic on the grounds it is irrelevant and not
6 proportional to the needs of the case. Defendant also objects to this topic on the
7 grounds that it is unduly burdensome and oppressive as this information should be
8 sought by other discovery methods.

9 **REQUEST NO. 17:**

10 Any and all facts regarding Daniel Cohen's medical screening at the time
11 that he began his incarceration with the County of Los Angeles in January 2013.

12 **OBJECTIONS TO TOPIC NO. 17:**

13 Objection. Defendant objects to this topic on the grounds it is irrelevant and not
14 proportional to the needs of the case. Defendant also objects to this topic on the
15 grounds that it is unduly burdensome and oppressive as this information should be
16 sought by other discovery methods.

17 **REQUEST NO. 18:**

18 The identity of all current or former County of Los Angeles Sheriffs
19 Deputies who have been investigated by the County of Los Angeles for denying a
20 irunate or pretrial detainee the opportunity to receive medical care or treatment for
21 the time period from January 1, 2013 to the present.

22 **OBJECTIONS TO TOPIC NO. 18:**

23 Objection. Defendant objects to this topic on the grounds it is vague, ambiguous,
24 and overbroad as to "all current and former County of Los Angeles Sheriff's
25 Deputies who have been investigated by the County of Los Angeles." Defendant
26 also objects to this topic on the grounds that it violates the privacy rights of County
27 of Los Angeles employees regarding their employment/personnel records. Further
28

1 Defendant objects to this topic as irrelevant, not proportional to the needs of the
2 case, unduly burdensome and oppressive.

3 **REQUEST NO. 19:**

4 All of the County of Los Angeles' sustained findings that a current or former
5 County of Los Angeles Sheriff's Deputy denied an inmate or pretrial detainee the
6 opportunity to receive medical care or treatment for the time period from January
7 1, 2013 to the present.

8 **OBJECTIONS TO TOPIC NO. 19:**

9 Objection. Defendant objects to this topic on the grounds it is vague, ambiguous,
10 and overbroad as to "sustained findings." Defendant also objects to this topic on
11 the grounds that it violates the privacy rights of County of Los Angeles employees
12 regarding their employment/personnel records. Further Defendant objects to this
13 topic as irrelevant, not proportional to the needs of the case, unduly burdensome
14 and oppressive.

15 **REQUEST NO. 20:**

16 The identity and contact information of all individuals who initiated a
17 complaint of denial of the opportunity to receive medical care or treatment against
18 a current or former County of Los Angeles Sheriff's Deputy during the time period
19 from January 1, 2013 to the present.

20 **OBJECTIONS TO TOPIC NO. 20:**

21 Objection. Defendant objects to this topic on the grounds it is vague, ambiguous,
22 and overbroad as to "all individuals who initiated a complaint." Defendant also
23 objects to this topic on the grounds that it violates the privacy rights of individuals
24 incarcerated in County of Los Angeles facilities regarding their jail records.
25 Further, Defendant objects because this topic is conjunctive, irrelevant, not
26 proportional to the needs of the case, unduly burdensome and oppressive.

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1 **REQUEST NO. 21:**

2 The identity of all current or former County of Los Angeles medical staff
3 employees who have been investigated by the County of Los Angeles for
4 deliberate indifference to the medical needs of an inmate or pretrial detainee for the
5 time period from January 1, 2013 to the present.

6 **OBJECTIONS TO TOPIC NO. 21:**

7 Objection. Defendant objects to this topic on the grounds it is vague, ambiguous,
8 and overbroad as to “all current and former County of Los Angeles medical staff
9 employees who have been investigated by the County of Los Angeles.” Defendant
10 also objects to this topic on the grounds that it violates the privacy rights of County
11 of Los Angeles employees regarding their employment/personnel records. Further
12 Defendant objects because this topic is not proportional to the needs of the case,
13 unduly burdensome and oppressive.

14 **REQUEST NO. 22:**

15 All of the County of Los Angeles' sustained findings that a current or former
16 County of Los Angeles medical staff employee was deliberately indifferent to the
17 medical needs of an inmate or pretrial detainee for the time period from January 1,
18 2013 to the present.

19 **OBJECTIONS TO TOPIC NO. 22:**

20 Objection. Defendant objects to this topic on the grounds it is vague, ambiguous,
21 and overbroad as to “sustained findings.” Defendant also objects to this topic on
22 the grounds that it violates the privacy rights of County of Los Angeles employees
23 regarding their employment/personnel records. Further Defendant objects to this
24 topic as irrelevant, not proportional to the needs of the case, unduly burdensome
25 and oppressive.

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1 **REQUEST NO. 23:**

2 The identity and contact information of all individuals who initiated
3 complaint of deliberate indifference to the medical needs of an inmate or pretrial
4 detained against a County of Los Angeles medical staff employees during the time
5 period from January 1, 2013 to the present.

6 **OBJECTIONS TO TOPIC NO. 23:**

7 Objection. Defendant objects to this topic on the grounds it is vague, ambiguous,
8 and overbroad as to “all individuals who initiated a complaint.” Defendant also
9 objects to this topic on the grounds that it violates the privacy rights of individuals
10 incarcerated in County of Los Angeles facilities regarding their jail records. This
11 topic also violates the privacy rights of County of Los Angeles employees
12 regarding their employment/personnel records. Further, Defendant objects because
13 this topic is irrelevant, not proportional to the needs of the case, unduly
14 burdensome and oppressive.

15 Dated: October 8, 2021

**IVIE McNEILL WYATT
PURCELL & DIGGS**

17
18 By: /s/ Adé Jackson
19 **W. KEITH WYATT**
20 **ADÉ JACKSON**
21 **Attorneys for Defendants**
22 **COUNTY OF LOS ANGELES**
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27
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California; I am over the age of 18 and not a party to the within action; my business address is 444 South Flower Street, Suite 1800, Los Angeles, California, 90071.

On **October 8, 2021**, I served the foregoing document described as **DEFENDANT COUNTY OF LOS ANGELES' OBJECTION TO PLAINTIFF DANIEL COHEN'S RULE 30(b)(6) DEPOSITION NOTICE** on the interested parties in this action by placing true copies thereof enclosed in sealed envelopes addressed on attached Service List:

☐ **BY PERSONAL DELIVERY:** I caused such envelope to be delivered by hand to the addressee.

☒ **BY EMAIL TRANSMISSION:** I caused such DOCUMENT to be transmitted to the addressee. See Service List below

☐ **BY MAIL:** I caused such envelope to be deposited in the mail at Los Angeles, California, with first class postage thereon fully prepaid. I am readily familiar with the business practice for collection and processing of correspondence for mailing. Under that practice, it is deposited with the United States Postal Service on that same day, at Los Angeles, California, in the Ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage meter date is more than one (1) day after the date of deposit for mailing in affidavit.

☐ **BY FACSIMILE TRANSMISSION:** I caused such documents to be transmitted to the offices of the addressee via facsimile machine, on the date specified above. The facsimile machine telephone number I used, 213-489-0552, was in compliance with Rule 2003(3) and the transmission was reported as complete without error. Pursuant to Rule 2008(e), I caused a copy of the transmission report to be properly issued by the transmitting facsimile machine.

☐ **BY GSO OVERNIGHT DELIVERY:** I am "readily familiar" with the firm's practice of collection and processing correspondence for Federal Express. Under that practice, it would be picked up by a representative on that same day, in the ordinary course of business and would be delivered the next business day.

☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction this service was made.

Executed on **October 8, 2021**, Los Angeles, California.

/s/M. Christina Munoz
M. CHRISTINA MUNOZ

SERVICE LIST

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